

RECEIVED

FROM THE DESK OF

BEATRICE A. TUSIANI

3/5/96

MAR 18 1996

FCC MAIL ROOM Wm. J. Caton -

Can't thank you enough  
for including this issue  
in your recommendations.

Best regards,

Bea Tusiani  
(hearing-impaired  
citizen and journalist)

Compatibility Act of 1988."<sup>8</sup> In the event that the Commission disagrees, "EEAC strongly recommends that the Commission not adopt a final rule that is more burdensome on employees than the current proposal."<sup>9</sup>

GSA recommends that the Commission adopt the proposals of the HAC Committee without significant modification. A negotiated settlement of any type results in compromises by all involved parties, and the Commission should not allow individual parties to gain through subsequent pleas that which was lost at the bargaining table. Allowing a piece-parting of the HAC Committee's proposals would open a "Pandora's Box" of additional requests, and set a precedent which would severely impair the Commission's ability to use a negotiated rulemaking process in the future.

**III. The Commission Should Require All New Telephones To Be Equipped With A Volume Control Feature.**



The HAC Committee recommended that all newly acquired and replacement telephones have a volume control feature that permits the user to adjust the level of sound emanating from the handset.<sup>10</sup> The Commission has proposed adoption of this recommendation and various rules that prescribe technical, manufacturing and importation requirements for this feature.<sup>11</sup>

---

<sup>8</sup> Comments of EEAC, p. 2 (emphasis in original).

<sup>9</sup> Id., p. 10 (emphasis in original).

<sup>10</sup> NPRM, para. 55.

<sup>11</sup> Id., para. 61.

These proposals also received strong support from commenting parties.<sup>12</sup> In fact, some parties point out the benefits of this feature to the general population as well.<sup>13</sup> The League states:

The benefits of providing telephones with volume control capability goes beyond the obvious and substantial benefit volume control provides to some 26 million Americans who are hard of hearing; providing telephones with volume control also benefits people who have no recognized hearing impairment. When hearing people are exposed to noisy environments, such as can be found in restaurants, their ability to hear on the telephone is greatly compromised; in such a case, being able to increase the volume is clearly beneficial.<sup>14</sup>



The ACUTA adds:

By making it mandatory on all phones, the higher cost of manufacturing will be distributed across all telephones manufactured in the U.S., thereby lowering the average cost. In addition, we believe that this standard requirement will promote competition in the marketplace, thereby controlling the additional cost.<sup>15</sup>

---

<sup>12</sup> See, e.g., Comments of Telecommunications for the Deaf, Inc., p. 2.; the HANDS Organization ("HANDS"), p. 2; the Pittsburgh Hearing, Speech & Deaf Services, Inc., p. 2.

<sup>13</sup> See, e.g., Comments ASHA, p. 5.

<sup>14</sup> Comments of League, p. 3.

<sup>15</sup> Comments of ACUTA, p. 3.

SERVICE LIST  
(Cont.)

Telecommunications Reports  
11th Floor, West Tower  
1333 H Street, N.W.  
Washington, D.C. 20005

Richard B. Lee  
Senior Consultant  
Snavelly King Majoros O'Connor  
& Lee, Inc.  
1220 L Street, N.W., Suite 410  
Washington, D.C. 20005

John L. Bartlett  
Attorney for Aeronautical Radio  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Lawrence F. Chesto  
Director of Telecommunications System  
Aeronautical Radio, Inc.  
Annapolis, MD 21401

Alfred Sonnenstrahl  
Executive Director  
Telecommunications of the Deaf, Inc.  
8719 Colesville Road, Suite 300  
Silver Spring, MD 20910

Kenneth R. Mills  
Manager, Communications Product  
Development  
Thomson Consumer Electronics  
6225 Running Ridge Road  
Syracuse, NY 13212-2510

Bea Tusiani  
50 Lake Road  
Plandome Manor, NY 11030

David E. O'Neill  
President, ACUTA  
152 West Zandale Drive, Suite 200  
Lexington, KY 40503-2486

Mary McDermott  
United States Telephone Association  
1401 H Street, N.W.  
Suite 600  
Washington, D.C. 20005

Carole M. Rogin  
Hearing Industries Association  
515 King Street, Suite 420  
Alexandria, VA 22314

R. Michael Senkowski  
Attorney for Information Technology And  
Telecommunications Association  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Karen Peltz Strauss  
Legal Counsel for Telecommunications  
Policy  
National Association of the Deaf  
814 Thayer Avenue  
Silver Spring, MD 20910

Philip R. Peach  
Executive Director  
Oregon Lodging Association  
12724 SE Stark Street  
Portland, OR 97233